Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service	)	MB Docket No. 87-268

PETITION FOR RECONSIDERATION

Post-Newsweek Stations, Orlando, Inc. ("Post-Newsweek"), licensee of WKMG-DT, Orlando, Florida (Facility ID No. 71293) ("WKMG" or the "Station"), pursuant to Section 1.429(a) of the Commission's rules, respectfully requests that the Commission amend the Station's entry in the recently-published DTV Table of Allotments (the "Table"). Post-Newsweek's evaluation of the theoretical facilities described in the Table has revealed that it is not possible to construct an antenna that exactly matches the service area of those theoretical facilities, and Post-Newsweek therefore respectfully requests that the Commission modify the Table to specify the substantially equivalent facilities described in this Petition.

WKMG's theoretical Table facilities were designed to avoid interference to neighboring station WVEA, Venice, Florida. Although, as reflected in the attached statement by Meintel, Sgrignoli & Wallace, WKMG cannot construct these facilities, it proposes to use a polarized Dielectric antenna that closely matches the allotment pattern in WVEA's direction. The proposed facilities would operate from WKMG's allotted transmitter site at 866 kW effective radiated power ("ERP"). Although protection of

WVEA necessitates a *de minimis* extension of WKMG's contour beyond the theoretical contour proposed in the allotment, the proposal would not result in more than 0.1% interference to any broadcast station and would not result in substantial reduction in service to any viewers currently served by WKMG.

Grant of Post-Newsweek's request would serve the public interest. As the Commission recently acknowledged, certain "stations may be unable to build precisely the facilities specified in the new DTV Table Appendix B (for example, if an antenna producing the exact antenna pattern described in Appendix B is not available)."[1] It expressed concern that such stations might "be required to reduce their facilities so significantly that they will be unable to provide adequate service" to some viewers.[2] The comprehensive proposal described here would address this issue by ensuring that WKMG's community continues to receive full service without causing significant interference to any neighboring station.

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[1] *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, MB Docket No. 07-91, FCC 07-70, ¶ 93 (rel. May 18, 2007).

[2] *Id.*

Accordingly, Post-Newsweek respectfully requests that the Commission conform WKMG's entry in the Table with the facilities specified in this Petition and in the attached Engineering Statement.

Respectfully submitted,

POST-NEWSWEEK STATIONS, ORLANDO, INC.

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October 26, 2007

Meintel, Sgrignoli, & Wallace

Engineering Statement to Support
Post DTV Transition Allotment Parameter Change
WKMG Orlando, FL
October 24, 2007

In the FCC DTV channel election process WKMG Orlando, FL (Analog Channel 6, DTV Channel 58) has been allotted channel 26 for post transition DTV operation. The antenna pattern associated with this allotment is a modified version of the initial replication pattern. The initial pattern was modified to resolve an interference problem toward station WVEA channel 25 Venice, FL. However, it has not been possible to design an actual antenna that exactly matches the allotted pattern. Therefore, WKMG proposes to use an antenna designed by Dielectric (Model TFU-4C220-26) that closely matches the allotted pattern in the critical direction toward WVEA.

An analysis using the proposed antenna with an effective radiated power (ERP) of 866 kW indicates that it fully protects WVEA as well as all other stations listed in the Appendix B allotment table with no caused interference being greater than 0.1%. The antenna pattern does however cause the service contour of WKMG to exceed that predicted using the allotment pattern. A map comparing the extent of the contours for both the allotted facility and the proposed facility is attached.

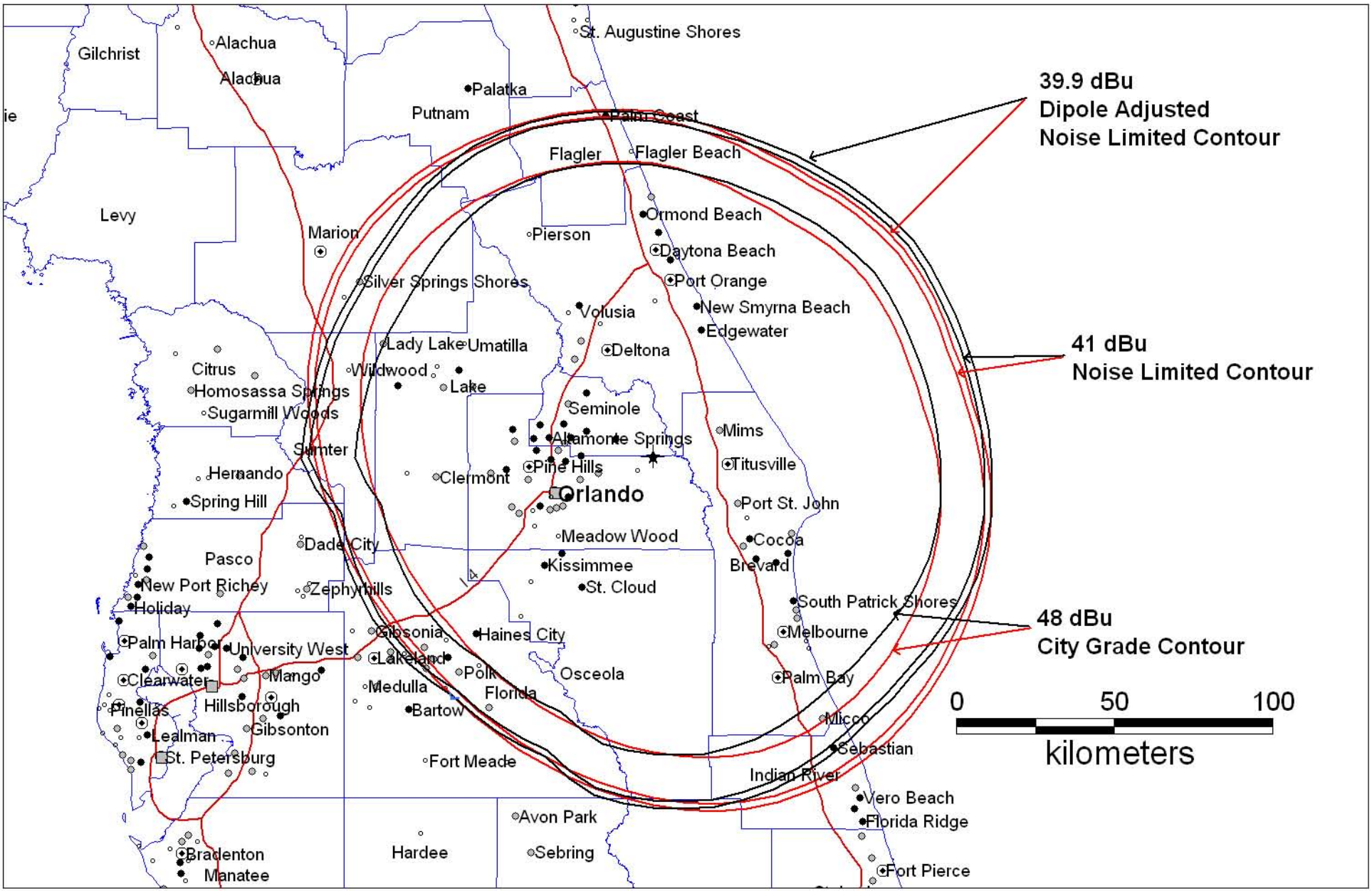
P. O. Box 907 Warrenton, VA 20188
Phone 540-428-2308 Fax 540-428-2309

Meintel, Sgrignoli, & Wallace

In that no additional interference is caused by the proposal, WKMG requests that its post transition DTV allotment parameters be modified to show the proposed antenna pattern (copy attached) with an ERP of 866 kW.

This report prepared by:

William R. Meintel
Partner
Meintel, Sgrignoli & Wallace



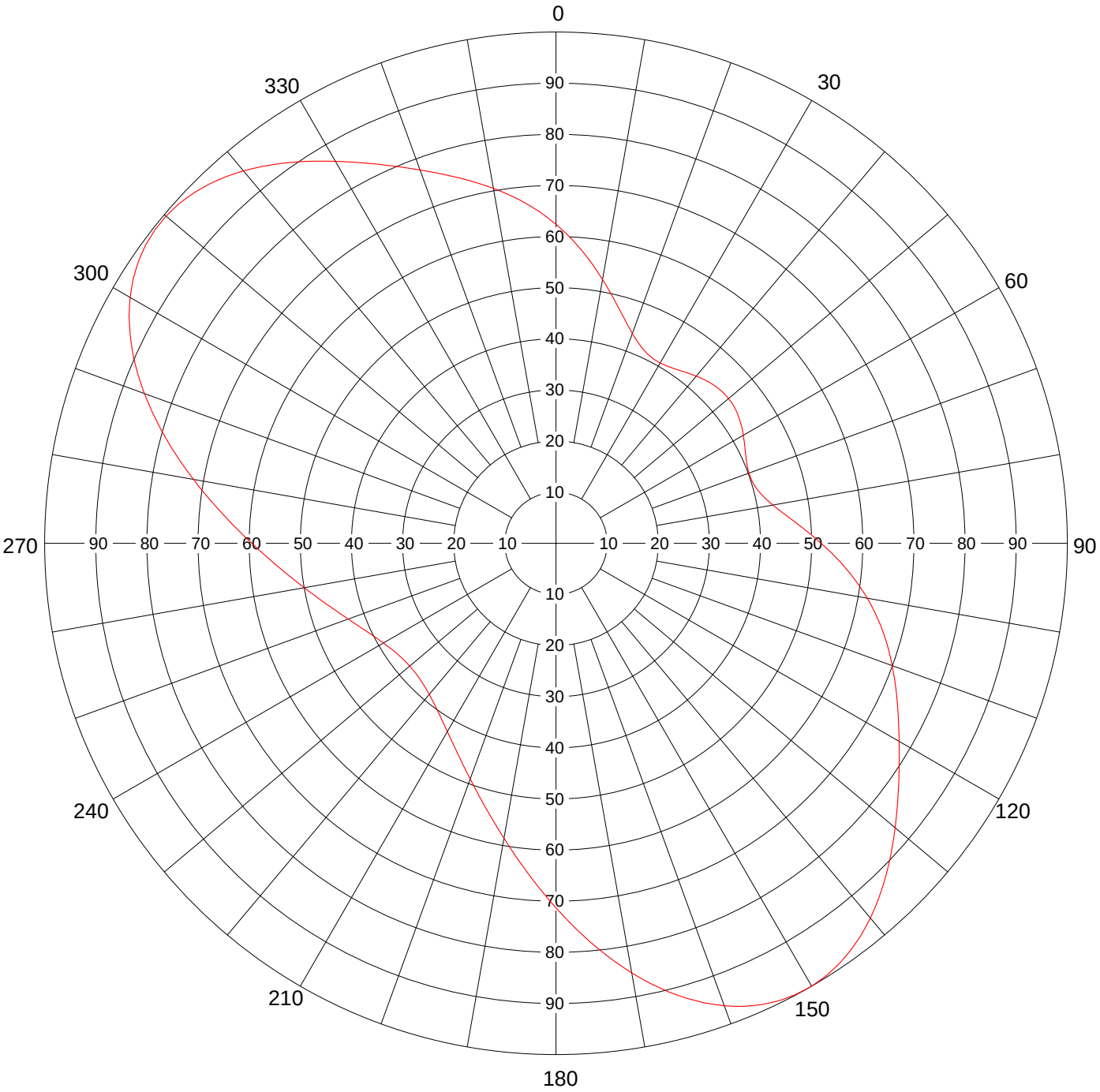
WKMG Orlando, FL - Post Transition DTV Channel 26
DTV Allotment Contours (BLACK)
DTV Contours at 866 kW - Proposed TFU-4C220 Antenna (RED)

Dielectric

Proposal Number		Revision	
Date	**15 Oct 2007**		
Call Letters	**WKMG**	Channel	**26**
Location			
Customer			
Antenna Type			

AZIMUTH PATTERN

Gain	**2.20 (3.42 dB)**	Frequency	**545 MHz**
Calculated / Measured	**Calculated**	Drawing #	**4C220-26**



Remarks:

Dielectric

Proposal Number
Date **15 Oct 2007**
Call Letters **WKMG**
Location
Customer
Antenna Type

Revision
Channel **26**

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # **4C220-26**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.624	45	0.437	90	0.519	135	0.914	180	0.713	225	0.376	270	0.595	315	0.981
1	0.614	46	0.439	91	0.529	136	0.923	181	0.699	226	0.375	271	0.606	316	0.977
2	0.605	47	0.439	92	0.539	137	0.932	182	0.685	227	0.374	272	0.618	317	0.971
3	0.595	48	0.440	93	0.549	138	0.941	183	0.672	228	0.374	273	0.630	318	0.965
4	0.585	49	0.440	94	0.560	139	0.949	184	0.659	229	0.373	274	0.642	319	0.958
5	0.575	50	0.441	95	0.570	140	0.957	185	0.646	230	0.373	275	0.654	320	0.951
6	0.565	51	0.440	96	0.580	141	0.964	186	0.633	231	0.374	276	0.667	321	0.943
7	0.555	52	0.439	97	0.590	142	0.971	187	0.621	232	0.374	277	0.680	322	0.935
8	0.545	53	0.438	98	0.599	143	0.976	188	0.609	233	0.376	278	0.693	323	0.927
9	0.534	54	0.437	99	0.609	144	0.982	189	0.597	234	0.377	279	0.706	324	0.918
10	0.524	55	0.435	100	0.618	145	0.987	190	0.586	235	0.378	280	0.720	325	0.909
11	0.514	56	0.433	101	0.627	146	0.991	191	0.575	236	0.380	281	0.734	326	0.900
12	0.504	57	0.431	102	0.636	147	0.994	192	0.564	237	0.382	282	0.747	327	0.891
13	0.494	58	0.428	103	0.645	148	0.997	193	0.554	238	0.384	283	0.761	328	0.881
14	0.485	59	0.426	104	0.653	149	0.999	194	0.544	239	0.387	284	0.775	329	0.872
15	0.476	60	0.423	105	0.661	150	1.000	195	0.534	240	0.390	285	0.789	330	0.863
16	0.467	61	0.420	106	0.669	151	1.000	196	0.525	241	0.393	286	0.803	331	0.854
17	0.459	62	0.417	107	0.677	152	0.999	197	0.516	242	0.396	287	0.817	332	0.844
18	0.451	63	0.415	108	0.685	153	0.997	198	0.507	243	0.400	288	0.830	333	0.835
19	0.444	64	0.412	109	0.692	154	0.995	199	0.499	244	0.404	289	0.843	334	0.826
20	0.437	65	0.409	110	0.700	155	0.991	200	0.491	245	0.408	290	0.857	335	0.818
21	0.431	66	0.407	111	0.707	156	0.988	201	0.483	246	0.412	291	0.869	336	0.809
22	0.425	67	0.405	112	0.714	157	0.982	202	0.475	247	0.417	292	0.882	337	0.801
23	0.421	68	0.403	113	0.722	158	0.977	203	0.468	248	0.422	293	0.893	338	0.793
24	0.417	69	0.402	114	0.729	159	0.970	204	0.461	249	0.427	294	0.905	339	0.785
25	0.414	70	0.401	115	0.736	160	0.963	205	0.455	250	0.433	295	0.916	340	0.777
26	0.411	71	0.402	116	0.744	161	0.954	206	0.448	251	0.438	296	0.927	341	0.769
27	0.409	72	0.402	117	0.751	162	0.945	207	0.442	252	0.444	297	0.936	342	0.762
28	0.408	73	0.403	118	0.759	163	0.936	208	0.436	253	0.450	298	0.946	343	0.755
29	0.408	74	0.405	119	0.767	164	0.926	209	0.431	254	0.457	299	0.954	344	0.747
30	0.407	75	0.408	120	0.775	165	0.914	210	0.425	255	0.463	300	0.962	345	0.740
31	0.408	76	0.410	121	0.783	166	0.903	211	0.420	256	0.470	301	0.968	346	0.733
32	0.409	77	0.415	122	0.792	167	0.891	212	0.415	257	0.477	302	0.975	347	0.726
33	0.411	78	0.419	123	0.800	168	0.879	213	0.411	258	0.484	303	0.980	348	0.719
34	0.412	79	0.425	124	0.809	169	0.866	214	0.406	259	0.492	304	0.985	349	0.712
35	0.414	80	0.431	125	0.818	170	0.853	215	0.402	260	0.500	305	0.989	350	0.705
36	0.417	81	0.438	126	0.827	171	0.840	216	0.398	261	0.508	306	0.992	351	0.698
37	0.419	82	0.445	127	0.837	172	0.826	217	0.395	262	0.516	307	0.994	352	0.690
38	0.422	83	0.453	128	0.846	173	0.812	218	0.391	263	0.525	308	0.995	353	0.683
39	0.424	84	0.461	129	0.856	174	0.798	219	0.388	264	0.534	309	0.996	354	0.675
40	0.427	85	0.470	130	0.866	175	0.784	220	0.386	265	0.544	310	0.996	355	0.667
41	0.429	86	0.479	131	0.875	176	0.770	221	0.383	266	0.553	311	0.994	356	0.659
42	0.432	87	0.489	132	0.885	177	0.755	222	0.381	267	0.563	312	0.992	357	0.650
43	0.434	88	0.498	133	0.895	178	0.741	223	0.379	268	0.573	313	0.989	358	0.642
44	0.436	89	0.509	134	0.904	179	0.727	224	0.377	269	0.584	314	0.986	359	0.633

Remarks: